

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
AT CINCINNATI

DEBORA A. BOONE, : CASE NO. 1:02cv147
Administratrix of the Estate
Craig S. Hutchison : D.J. BECKWITH
M.J. HOGAN
Plaintiff :
vs. : **PLAINTIFF, DEBORA A. BOONE'S**
MOTION FOR EXTENSION OF
AMERICAN UNITED LIFE : **TIME**
INSURANCE CO. :
Defendant :

Comes the Plaintiff, Debora A. Boone, Administratrix of the Estate of Craig S. Hutchison, through her undersigned counsel, and moves the Court for an Order extending the time to File a Primary Application for Attorney's Fees and a Brief. Counsel for the Plaintiff states the purpose of this Motion is not to delay the action. The reasons for the request for extension of time are set forth in the Memorandum hereafter. Robert P. Johnson, Counsel for Defendant, American United Life Insurance Co., has been consulted and does not object to this Motion.

s/**Michael E. Cassity**
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MEMORANDUM IN SUPPORT

The current due date for Plaintiff's Primary Application for Attorney's Fees and Brief is March 31, 2004. Plaintiff is requesting seven (7) additional days to file said Primary Application for Attorney's Fees and Brief. The reason for the request is because the parties are attempting to settle this dispute. The person with the authority to settle this dispute on behalf of Defendant is out of town until April 5, 2004. Robert P. Johnson, Counsel for Defendant, does not object to this Motion.

WHEREFORE, Plaintiff, Debora A. Boone, Administratrix of the Estate of Craig S. Hutchison, requests that this Court grant her seven (7) additional days to file her Primary Application for Attorney's Fees and Brief in the within action until April 7, 2004.

s/Michael E. Cassity

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Extend Time to File Primary Application for Attorney's Fees and Brief was mailed by ordinary U. S. Mail this 30th day of March, 2004 to Robert P. Johnson, Trial Attorney for Defendant, Thompson Hine LLP, 312 Walnut Street, Suite 1400, Cincinnati, OH 45202.

s/Michael E. Cassity

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